

**REMARKS**

Reconsideration and allowance of the subject application are respectfully requested. Applicants have carefully considered the Final Office Action issued August 15, 2001 in the above-titled matter. Claims 1-13, 16-18 and 22-24 are pending. New claims 25-43 have been added.

Claims 1, 3, 5, 7-13, 17-18 and 24 have been amended to place the claims in condition for allowance or, in the alternative, in better form for appeal.

Claims 1-13, 16-18 and 23 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Kugimiya et al (5,005,127, "Kugimiya") in view of Maruyama et al. (5,640,575, "Maruyama"). The rejection is respectfully traversed.

Kugiyama teaches a method of manually inputting "no-conversion start markers" and "no-conversion stop markers" in a source language text as defined by adding double opening braces and double closing braces, respectively, input during the input of source language text (col. 5, lines 20-33). During translation, the double braces indicate "no-conversion" of text (col. 6, lines 35-41). Kugiyama determines "no-conversion" based on manually inputted symbols (i.e., braces) and does not teach or suggest:

... identifying an element as a source placeable element by predetermined criteria based on the element as called for in the claim 1 invention...

Maruyama does not cure the deficiencies of Kugimiya. Maruyama discloses a method and apparatus of translation based on translation patterns. Maruyama does not teach or suggest:

...identifying an element as a source placeable element by predetermined criteria based on the element...

and provides no motivation to one of ordinary skill in the art to do so. Thus, the Examiner has failed to establish a *prima facie* case of obviousness and it is respectfully submitted that the rejection should be withdrawn.

Claim 17 recites a computer driven language processing system comprising, among other things,

an element identifier, wherein the element identifier identifies an element as a source placeable element by predetermined criteria based on the element.

Claim 18 recites a computer driven language processing system comprising, among other things,

an element identifier identifying placeable elements by a predetermined criteria based on the elements.

Neither Kugimiya nor Maruyama, either alone or in combination teach or suggest all elements of claim 17 or claim 18 for the same reasons as set forth above for claim 1. Thus, the Examiner has failed to establish a *prima facie* case of obviousness and it is respectfully submitted that the rejection should be withdrawn.

Claims 2-13, 16 and 23 depend from independent claims 1, 17 or 18 and are therefore allowable for at least the reasons cited for the independent claims. Thus, it is respectfully submitted that the rejection of claims 1-13, 16-18 and 23 should be withdrawn.

the content of the source placeable element and calculating at least a portion of a source placeable element into a target placeable element.

As stated above, neither Motoyama nor Maruyama, either alone or in combination, teaches text translation and non-translation of text based on SGML tags inserted into the text but does not teach or suggest "calculating at least a portion of a source placeable element" and does not teach or suggest identifying a source placeable element by predetermined criteria based on the content of the source placeable element. Thus, the Examiner has failed to establish a *prima facie* case of obviousness and withdrawal of the rejection is respectfully submitted.

Claims 22 and 23 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Kugimiya et al (5,005,127, "Kugimiya") in view of Maruyama et al. (5,640,575, "Maruyama") and in further view of Beauregard (5,974,413). The rejection is respectfully traversed.

Kugimiya or Maruyama, either alone or in combination, does not teach or suggest claim 1 for reasons cited above. Claims 22 and 23 depend from claim 1 and are therefore allowable for at least the reasons set forth above for claim 1.

Beauregard does not cure the deficiencies of Kugimiya and Maruyama. Beauregard merely teaches methods involving currency conversion but fails to teach or suggest identifying an element as a source placeable element by predetermined criteria based on the element as called for in the claim 1 invention. Kugimiya or Maruyama, either alone or in combination also fail to teach or suggest identifying an element as a source placeable element by predetermined criteria based on the element as set forth

Claims 1-13, 16-18 and 24 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Motoyama (5,848,386) in view of Maruyama et al. (5,640,575, "Maruyama"). The rejection is respectfully traversed.

Motoyama teaches a method and system for translating documents wherein information contained within the document used to indicate different sections is encoded using Standard Generalized Markup Language (SGML) tags. Non-translated text is indicated by translation of SGML tags as <OVERVIEW> or <LANG>. Motoyama identifies non-translated text based on SGML tags added into the text and does not teach or suggest:

identifying an element as a source placeable element by predetermined criteria based on the element as called for in the claim 1 invention.

Maruyama does not cure the deficiencies of Motoyama for reasons set forth above. The Examiner has failed to establish a *prima facie* case of obviousness because neither Motoyama nor Maruyama, either alone or in combination, provides one of ordinary skill in the art with the requisite motivation to combine the references and thereby render claim 1 obvious.

Claims 17 and 18 are recited above. Neither Motoyama nor Maruyama, either alone or in combination teaches or suggests claim 17 or claim 18 invention for similar reasons as set forth above for claim 1. Thus, the Examiner has failed to provide a *prima facie* case of obviousness and it is respectfully submitted that the rejection should be withdrawn.

Claim 24 recites a method for processing source information comprising, among other things, identifying a source placeable element by predetermined criteria based on

above. As all references, alone or in combination fail to teach or suggest claim 1, 22 or 23 and the Examiner has not addressed this failure, one of ordinary skill in the art would not have been motivated to practice the claim 1, 22 or 23 invention. Therefore, it is respectfully submitted that the rejection should be withdrawn.

Claims 22 and 23 stand rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Motoyama (5,848,386) in view of Maruyama et al. (5,640,575, "Maruyama") and in further view of Beauregard (5,974,413). The rejection is respectfully traversed.

Motoyama or Maruyama, either alone or in combination, do not teach or suggest the claim 1 invention for reasons cited above. Claims 22 and 23 depend from claim 1 and are therefore allowable for at least the reasons set forth above for claim 1.

Beauregard does not cure the deficiencies of Motoyama and Maruyama. Beauregard merely teaches methods involving currency conversion but fails to teach or suggest identifying an element as a source placeable element by predetermined criteria based on the element as called for in the claim 1 invention. Motoyama or Maruyama, either alone or in combination also fail to teach or suggest identifying an element as a source placeable element by predetermined criteria based on the element as set forth above. As all references, alone or in combination fail to teach or suggest claim 1, 22 or 23 and the Examiner has not addressed this failure, one of ordinary skill in the art would not have been motivated to practice the claim 1, 22 or 23 invention. Therefore, it is respectfully submitted that the rejection should be withdrawn.

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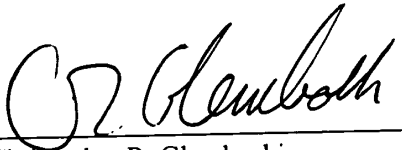
Atty Docket No: 4832.00022

New claims 25-43 are allowable over the cited prior art for at least the reasons set forth above.

In view of the above, it is respectfully submitted that the application is in condition for allowance. Reconsideration and prompt allowance are respectfully requested. If the Examiner feels that a telephone interview would be helpful in facilitating prosecution of the case, the Examiner is respectfully requested to contact the undersigned attorney of record to discuss the application.

Respectfully submitted,

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**MARKED-UP VERSION OF AMENDMENTS**

**IN THE CLAIMS**

1. (Amended) A method for processing source information comprising the steps of:

parsing input source information into elements;

identifying an element as a source placeable element by predetermined criteria based on the content of the element; and

converting at least a portion of said source placeable element into a target placeable element.

3. (Amended) A method for processing source information according to claim 2, further comprising the step of:

applying a source placeable identifier to determine [said] a type of said source placeable element.

5. (Amended) A method for processing source information according to claim 1, further comprising the steps of:

designating a type of said source placeable element;

applying a target placeable converter to convert said type of said source placeable element.

7. (Amended) A method for processing source information according to claim 1, further comprising the step of:

converting said source placeable element into a language-independent format.

8. (Amended) A method for processing source information according to claim 1, further comprising the steps of:

determining whether said source placeable element is a proper noun;

placing said source placeable element directly into a target output.

9. (Amended) A method for processing source information according to claim 1, further comprising the steps of:

determining whether said source placeable element is a date;

converting said date into a target information according to a target locale information.

10. (Amended) A method for processing source information according to claim 1, further comprising the steps of:

determining whether said source placeable element is a proper noun;

converting said source placeable element into a language independent format.



11. (Amended) A method for processing source information according to claim 1, further comprising the steps of:

determining whether said source placeable element is a proper noun;

converting said source placeable element into a meta-representation.

12. (Amended) A method for processing source information according to claim 1, further comprising the steps of:

determining whether said source placeable element is a date;

converting said source placeable element into a language independent format.

13. (Amended) A method for processing source information according to claim 1, further comprising the step of:

determining whether said source placeable element requires conversion.

17. A computer driven language processing system for processing source information comprising:

a parser;

an element identifier, connected to an output of said parser;

a type designator, connected to an output of said element identifier; and

a placeable converter,

wherein the element identifier identifies an element as a source placeable element by predetermined criteria based on the content of the element.

18. A computer driven language processing system for processing source information comprising:

a parser for parsing source information into elements;

an element identifier identifying placeable elements by a predetermined criteria

based on the content of the elements;

a type designator for designating said placeable elements by type; and

a placeable converter.

24. (Amended) A method for processing source information comprising the steps of:

parsing input source information into elements;

identifying a source placeable element by predetermined criteria based on the content of the source placeable element; and

calculating at least a portion of said source placeable element into a target placeable element.